

Michigan's Clean Corporate Citizen (C3) Program



Fact Sheet

The Clean Corporate Citizen (C3) program is built on the concept that Michigan establishments that consistently demonstrate environmental stewardship and pollution prevention can be relied upon to carry out their environmental protection responsibilities without rigorous oversight. These establishments should enjoy greater regulatory flexibility than those that do not demonstrate that same level of environmental awareness.

The C3 program operates under the Administrative Rules R 324.1501 through 324.1511, under the authority of Public Act 451 (Natural Resources and Environmental Protection Act) of 1994, as amended.

WELCOME TO THE C3 PROGRAM



The Clean Corporate Citizen (C3) program allows regulated establishments that have demonstrated strong environmental performance and a commitment to continual environmental improvement to be recognized as Clean Corporate Citizens. C3s who participate in this program receive public recognition for their efforts and are eligible for benefits including expedited permit reviews and fewer monitoring and reporting requirements.

Participation in the C3 program is voluntary and diverse. A wide range of Michigan establishments have achieved C3 status, ranging from manufacturing, auto assembly, power generation, furniture making, natural gas transmission, paper production, office management, research and development, barrel/drum reconditioning and sales, and rotogravure printing.

The goal is to have a large number of establishments participate in the C3 program, with resulting improvements to the environment

and regulatory benefits to the participants. Recognizing and rewarding environmental performance greatly benefits our shared environment. By providing participation incentives for companies, municipalities, and institutions, the C3 program will foster increased compliance and a higher level of environmental performance.

BENEFITS FOR YOUR ESTABLISHMENT

An establishment ready to apply for C3 designation has *already* realized benefits from developing and operating under an environmental management system and a strong

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pollution prevention program. Establishments that maintain compliance, commit to continual environmental improvement, and involve employees at all levels in efforts to minimize waste and other negative environmental impacts, will reap the benefits of sound stewardship now and through the years.

Studies have shown that well-designed environmental management and pollution prevention programs can result in significant savings. The public benefits as well from the increase in environmental protection and the lessening of negative impacts on the environment. These benefits are a direct result of responsible environmental management and pollution prevention that C3's build into all levels of their operations.

Designated C3s also receive positive public recognition for their environmental efforts in their community and throughout the state. This increased visibility as an environmentally conscious establishment can also add value to a company's competitive position in today's global marketplace.

Achieving C3 status helps an establishment get well-deserved recognition and congratulations for environmental achievements from customers, "parent" corporations, suppliers, trade associations, local citizens, and government. When an establishment voluntarily makes a firm and lasting commitment to protect the environment, management, employees, and the surrounding community all benefit.

REGULATORY BENEFITS IN FOUR PROGRAM AREAS

In addition to the positive public recognition and marketplace advantages, C3s also qualify for tangible benefits that allow permitting flexibility, shorten the waiting period to receive necessary permits, and reduce monitoring and

reporting oversight. Currently, there are benefits available to C3s in the following areas:

- ❖ Air permitting
- ❖ Groundwater discharges
- ❖ Surface water discharges
- ❖ Underground storage tanks

Benefits are provided through the DEQ environmental program divisions by administrative rules under the authority of Public Act 451 of 1994, as amended, Public Act 399 of 1976, as amended, and Public Act 368 of 1978, as amended.

APPLICABILITY

Participation in the C3 program is voluntary. The DEQ welcomes applications from responsible Michigan companies, institutions, and local units of government, both large and small. Establishments that want to apply for C3 designation must meet the specific applicability criteria found in the program rules (R324.1503).

For example, an establishment with serious violations and penalties would not be eligible to apply for C3 designation. Refer to the program rules or contact the DEQ to discuss your particular establishment if you have concerns about applicability.

CRITERIA FOR PARTICIPATION

The C3 program requires performance in three significant areas: environmental management, pollution prevention (P2), and environmental compliance.

Environmental Management

A Clean Corporate Citizen must have a strong and effective environmental management system (EMS) in place, based on the nature and scale of its operations (see "EMS Close-Up"). An EMS that meets the criteria includes, among other components:

- ❖ Identification of environmental aspects and impacts
- ❖ Self-initiated compliance audits
- ❖ Public communication
- ❖ Environmental training for employees
- ❖ A clear statement of the establishment's commitment to environmental excellence and continual improvement

Establishments that are certified to ISO 14001, the international standard for environmental management systems, also meet the EMS criteria for C3 designation.

Pollution Prevention

Applicants meet these criteria by adopting a P2 policy and program to reduce waste at the source and by taking actions to:

- ❖ Identify P2 opportunities
- ❖ Establish goals to address these opportunities
- ❖ Report on accomplishments
- ❖ Participate in information and technical exchange programs

An establishment can also satisfy the P2 criteria by joining and being a member in good standing in one of the DEQ's recognized pollution prevention partnerships.

Environmental Compliance

To apply for C3 designation, an applicant must demonstrate consistent compliance with all applicable environmental requirements and have no outstanding unresolved violations. A complete list of establishment-related permits, licenses, and binding agreements is required as part of the application. Specific compliance criteria must be met to apply for and receive C3 designation and upon annual renewal.

APPLICATION PROCESS

A pre-meeting with DEQ staff is recommended as a first step. These voluntary pre-meetings give applicants an opportunity to discuss their establishments, review the applicability requirements, and ask detailed questions about the C3 process and available benefits.

The actual application process begins when the applicant provides public notice and a forum for public review of its completed application and supporting materials. At this time the applicant also provides a list of permits, licenses, and binding agreements to the DEQ; and a compliance review is conducted by the department. After this 30-day public review and if no compliance issues are raised, the candidate submits the application and materials to the DEQ for review and subsequent approval or denial of C3 designation. The designation can be renewed annually if the establishment continues to meet the C3 criteria.



Application pre-meetings are available upon request.

For assistance during any phase of the C3 application process, contact the Environmental Science and Services Division at

800-662-9278. Applications can be mailed to:

Pollution Prevention & Compliance Assistance Section
Environmental Science and Services Division
Michigan Department of Environmental Quality
PO Box 30457
Lansing, MI 48909-7957

The Michigan Department of Environmental Quality (MDEQ) will not discriminate against any individual or group on the basis of race, sex, religion, age, national origin, color, marital status, disability, or political beliefs. Questions or concerns should be directed to the MDEQ Office of Personnel Services, PO Box 30473, Lansing, MI 48909.

EMS Close-Up

What is an Environmental Management System (EMS)?

An EMS is a voluntary system for identifying, controlling, and monitoring the regulated and nonregulated activities at a facility that could impact the environment. The EMS concept was developed by industry as a proactive way to:

- ✓ Improve environmental performance beyond that required by regulation.
- ✓ Create a more “level playing field” in environmental control in the world market.
- ✓ Provide a competitive advantage.
- ✓ Give credibility to environmental programs.

What does an EMS look like?

There is not one single type of EMS, but there are standards or formats to follow in developing a system. The most well-known and widely used EMS standard in the United States and the world is the International Organization for Standardization (ISO) standard, ISO 14001. The C3 rules on EMS content were based on ISO 14001. Some of the elements of an EMS are:

- ✓ Operational control through work instructions and procedures.
- ✓ Employee environmental training.
- ✓ Emergency response planning.
- ✓ Environmental recordkeeping and reporting.

Most likely, a facility already has programs and documents that satisfy most of the common elements. One might only need to formalize facility procedures and documents so the programs can be managed in a logical and accessible manner.

What are the benefits of an EMS?

A facility can reap numerous business benefits from EMS development in addition to those provided by C3 designation. These benefits include:

- Reduced costs – Facilities that have implemented EMS report improved operating efficiency through the focus on important issues, the development of standard procedures, and through increased employee training.
- Competitive advantage – Consumers and manufacturers are giving preference to products from environmentally responsible suppliers.
- Improved image – The local community, environmental regulators, and environmental groups see EMS development as an indication of a facility's willingness to be a responsible citizen and to go beyond compliance. They will be willing to recognize and reward those efforts.
- Enhanced regulatory compliance – The adoption of procedures and work instructions and the additional training will add consistency and stability to the environmental programs and reduce a facility's liability.
- Improved environmental performance – The systematic identification of potential environmental impacts and the on-going setting and achievement of goals to control those impacts will ultimately lead to improved performance and a cleaner environment.

For further information on how to develop an EMS specific to your facility, the Environmental Science and Services Division has an “Environmental Management System Guidance Manual” available. The manual is designed in workbook format to take you step-by-step through the process of developing an EMS. Medium and large establishments can use it as a resource to learn more about the necessary elements of an EMS and its value. Contact the Environmental Assistance Center at 800-662-9278 to order a copy.